

ERIC A. LIEPINS
ERIC A. LIEPINS, P.C.
12770 Coit Road, Suite 850
Dallas, Texas 75251
(972) 991-5591
(972) 991-5788 - Telefax

Proposed Attorneys for Debtor

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

IN RE

RICKY MCMINN

DEBTOR

§
§
§
§
§
§
§
§

Case no. 23-10394-11

CHAPTER 11

MOTION TO SELL

THIS PLEADING REQUESTS RELIEF THAT MAY BE ADVERSE TO YOUR INTERESTS.

IF NO TIMELY RESPONSE IS FILED WITHIN 21 DAYS FROM THE DATE OF SERVICE THE RELIEF REQUESTED MAY BE GRANTED WITHOUT A HEARING BEING HELD.

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, Ricky McMinn (“McMinn”) Debtor in the above styled and numbered cause and files this his Motion to Sell Property of the Estate (“Motion”) and would respectfully show unto the Court as follows:

1. This Court has jurisdiction over this proceeding and the parties and property affected

hereby pursuant to 28 U.S.C. §§1334 and 157. Consideration of the Motion constitutes a core proceeding as defined in 28 U.S.C. §157(b)(2)(A), (K), (M) and (O).

2. The Debtor commenced this proceeding on June 5, 2023 by filing a voluntary petition under Chapter 11 of the United States Bankruptcy Code. Since the filing of the petition, the Debtor has remained in possession of his assets and continued in operation of his business as a debtor-in-possession pursuant to 11 U.S.C. §§1107 and 1108.
3. The Debtor maintains minority interest in a number of business entities.
4. The Debtor has been approached by his partners in two entities known as 18628FM1431, LLC and NoFilterBarGroup, LLC who have made him an offer for his interests.
5. Debtor is currently 20% owner in 18628FM1431, LLC and a 31% owner of NoBarFilterGroup, LLC.
6. As a result of these minority interests, the Debtor has no ability to control any distribution or management of the entities.
7. In order to provide funds for the reorganization of his affairs, the Debtor desires to sell his interest in these entities.
8. The Debtor has received an offer of \$100,000 for the 18628FM1431, LLC entity and an offer of \$350,000 for the NoBarFilerGroup, LLC entity ("Purchase Price").
9. The Purchase Price shall be paid in 60 equal monthly installments of for a total of \$7,500 commencing 30 days after approval of the sale by this Court.

10. The Debtor shall maintain his interest as security for the payment of the Purchase Price until paid in full under this proposed sale.
11. The purchaser of the NoBarFilerGroup, LLC entity is NoBarFilerGroup, LLC. The purchasers of the 1826FM1431, LLC entity are Matthew Delahoussaye and Monica Wofford who are the current majority interest holders in 1826FM1431, LLC.
12. The Debtor would show that the purchase is in the best interests of the creditors of the estate as it allows the Debtor to monetize his interest in the entities for the benefit of the creditors.
13. All funds from the sale will be placed into the Debtor in Possession account and will not be distributed absent further order of this Court.

WHEREFORE, PREMISES CONSIDERED, the Debtor would request this matter be set down for a Hearing and that upon hearing, this Court enter an Order authorizing the Debtor's Sale of the interest in the entities as set forth above, and for such other and further relief as the Debtor may show itself justly entitled.

Respectfully submitted,

Eric A. Liepins
Eric A. Liepins, P.C.
12770 Coit Road
Suite 850
Dallas, Texas 75251
(972) 991-5591
(972) 991-5788 - telecopier

By: /s/ Eric Liepins
Eric A. Liepins, SBN 12338110
PROPOSED ATTORNEY FOR DEBTOR

Certificate of Service

I hereby certify that a true and correct copy of the foregoing Motion was sent via telecopy or mail to all creditors of the Debtor on this the 30th day of August 2023.

_____/s/ Eric Liepins_____
Eric A. Liepins